

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHRISTINA MARY REYNOLDS, on behalf
of herself and all others similarly situated,

Plaintiff,

v.

TURNING POINT HOLDING
COMPANY, LLC, *et al.*,

Defendants.

Civil Action No.: 2:19-cv-01935-JDW

**MOTION FOR ATTORNEYS' FEES AND EXPENSES AND FOR
PLAINTIFFS' SERVICE PAYMENTS**

Named Plaintiffs, by and through their undersigned counsel, respectfully moves this Court for an Order:

1. Awarding attorneys' fees in the amount of \$271,830, which represents 34% of the Settlement Amount;
2. Reimbursement of out-of-pocket litigation expenses of \$24,376.64;
3. Approval of Named Plaintiffs' Service Payments of \$5,000 to each of the three Plaintiffs in recognition of their valuable service to the Settlement Class; and
4. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

- A. Memorandum of Law in Support of Plaintiffs' Motion for Attorneys' Fees and Expenses and for Plaintiffs' Service Payments; and
- B. Declaration of Gerald D. Wells, III in Support of Motion for Attorneys' Fees and Expenses and for Plaintiffs' Service Payments, and exhibit thereto.

Dated: November 16, 2022

Respectfully Submitted,

CONNOLLY WELLS & GRAY, LLP

/s/ Gerald D. Wells, III

Gerald D. Wells, III

Robert J. Gray

101 Lindenwood Drive, Suite 225

Malvern, PA 19355

Telephone: 610-822-3700

Facsimile: 610-822-3800

rgray@cwglaw.com

gwells@cwglaw.com

LYNCH CARPENTER LLP

Gary F. Lynch

Edward W. Ciolko

1133 Penn Avenue, 5th Floor

Pittsburgh, PA 15222

Telephone: (412) 322-9243

Facsimile: (412) 231-0246

gary@lcllp.com

eciolko@lcllp.com

Counsel for Plaintiffs and the Classes